

# EXHIBIT

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**Law Offices of Avrum J. Rosen, PLLC**  
38 New Street  
Huntington, New York 11743  
(631) 423-8527  
Avrum J. Rosen, Esq.  
Nico G. Pizzo, Esq.

**Hearing Date:** \_\_\_\_\_  
**Hearing Time:** \_\_\_\_\_  
**Objection Deadline:** \_\_\_\_\_

*Attorneys for the Debtor and Debtor-in-Possession*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

FRALEG GROUP, INC.,

Case No.: 22-41410-jmm

Debtor.

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**NOTICE OF: (I) APPROVAL OF DISCLOSURE STATEMENT;  
(II) HEARING ON CONFIRMATION OF DEBTOR’S PLAN OF REORGANIZATION;  
AND (III) RELATED PROCEDURES**

**PLEASE TAKE NOTICE** that, on \_\_\_\_\_, 2022, an order was entered in the above-captioned case approving Fraleg Group, Inc.’s (the “Debtor”) Disclosure Statement dated September 15, 2022 (the “Disclosure Statement”) with respect to the Debtor’s Plan of Reorganization dated September 15, 2022 (the “Plan”) <sup>1</sup> as containing “adequate information” pursuant to section 1125(a) of the Bankruptcy Code and granting related relief (the “Disclosure Statement Order”). A copy of the Disclosure Statement Order is being provided to you with this notice.

**PLEASE TAKE FURTHER NOTICE** that on \_\_\_\_\_ at \_\_\_\_:00 .m. (Eastern), or as soon thereafter as counsel may be heard, a hearing (the “Confirmation Hearing”) shall be conducted before the Honorable Jil Mazer-Marino, United States Bankruptcy Judge, on the Debtor’s request for entry of an order confirming the Plan, copies of which such Plan are being

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the same meanings ascribed to them in the Plan and Disclosure Statement Order.

provided to you with this notice.

**PLEASE TAKE FURTHER NOTICE** that the hearing shall not be held in person but shall be held telephonically or by video. Those intending to appear at the hearing must register with eCourt Appearances no later than two days prior to the hearing. The phone number or video link for the hearing will be emailed to those that register with eCourt Appearances in advance of the hearing. Instructions for registering with eCourt Appearances can be found at <https://www.nyeb.uscourts.gov/node/2126>. If you do not have internet access or are otherwise unable to register with eCourt Appearances, you may call or email Judge Mazer-Marino's courtroom deputy for instructions at (347) 394-1844, [JMM\\_Hearings@nyeb.uscourts.gov](mailto:JMM_Hearings@nyeb.uscourts.gov).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Disclosure Statement Order, the Bankruptcy Court approved the procedures for voting upon the Plan, which should be reviewed in their entirety by all voting claimants.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Disclosure Statement Order, the Bankruptcy Court has fixed a Voting Deadline of \_\_\_\_\_, **2022 by 5:00 p.m. (Eastern)** for completed Ballots to be received by counsel to the Debtor. Only Ballots cast by the Voting Deadline will be counted.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Disclosure Statement Order, the Bankruptcy Court has fixed an Objection Deadline of \_\_\_\_\_, **2022 by 5:00 p.m. (Eastern)** for objections to confirmation of the Plan, if any, to be filed with the Bankruptcy Court so as to be received by the Objection Deadline as follows: (i) attorneys (with full access accounts) should file any objection electronically on the Official Court Electronic Document Filing System (the "CM/ECF") system by the Objection Deadline; or (ii) those without accounts to the CM/ECF system may file their objection by mailing or delivering the original objection to the

Bankruptcy Court at the following address by the Objection Deadline:

United States Bankruptcy Court  
271-C Cadman Plaza East  
Suite 1595  
Brooklyn, NY 11201-1800

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Disclosure Statement Order, copies of any objection filed with the Bankruptcy Court should be simultaneously served on the Debtor's undersigned counsel and the United States Trustee by overnight mail, first class mail, hand delivery or electronic mail (at the addresses listed below) so as to be received by not later than the Objection Deadline:

Counsel to the Debtor:

Avrum J. Rosen, Esq.  
Law Offices of Avrum J. Rosen, PLLC  
38 New Street  
Huntington, New York 11743  
Email: arosen@ajrlawny.com

United States Trustee:

Nazar Khodorovsky, Esq., Trial Attorney  
Office of the United States Trustee  
201 Varick Street, Suite 1006  
New York, New York 10014  
Email: Nazar.khodorovsky@usdoj.gov

**PLEASE TAKE FURTHER NOTICE** that objections to confirmation of the Plan, if any, which do not comply with the Disclosure Statement Order, or which are not timely filed and served by the Objection Deadline, may not be considered and shall be deemed waived and/or overruled.

**PLEASE TAKE FURTHER NOTICE** that you need not appear at the Confirmation Hearing if you do not object to the relief to be requested at the Confirmation Hearing.

**PLEASE TAKE FURTHER NOTICE** that the Confirmation Hearing may be continued or adjourned from time to time without further notice other than by an announcement of the adjourned date at the Confirmation Hearing.

Dated: \_\_\_\_\_, 2022  
Huntington, New York

Respectfully submitted,

**Law Offices of Avrum J. Rosen, PLLC**

By: \_\_\_\_\_  
Avrum J. Rosen, Esq.  
Nico G. Pizzo, Esq.  
38 New Street  
Huntington, New York 11743  
(631) 423-8527  
arosen@ajrlawny.com  
npizzo@ajrlawny.com

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